

CAPCOA ENGINEERING MANAGERS COMMITTEE

Meeting Minutes

June 6, 2016 - Monday, 9:00 a.m. to 12:00 p.m.

**Napa Valley Marriott,
3425 Solano Avenue, Napa, CA 94105**

Monday, June 6th:

Part 1 – Administrative Business

Introductions/Attendance List

Jason Davis volunteered to handle the minutes for this meeting.

The attendees approved the Meeting Minutes for April 2016. We will reconsider the January 2016 minutes at the August 2016 meeting in Chico.

There were no additions or changes to Agenda.

Date	Host	Location: Room/Address
6/7/16 to 6/8/16	Symposium	Napa Valley Marriott, Napa, CA
8/8/16-8/9/16	Butte County APCD	Oxford Suites, Chico, CA
10/24/16-10/25/16	Ventura County APCD	Ventura City Hall, Ventura, CA

The committee reviewed the Action Items table and updated as appropriate.

Part 2 – Committee Updates and Board Assignments:

Enforcement/GDF Sub-committee – Danny Luong provided the group with updates on three topics: Phase I system pressurization, Mobile Fueling Platforms, and Dispenser Replacement.

Phase I Systems – The pressure/overpressure phenomenon continues to be top priority and to receive the majority of resources. The past three years of data indicates a consistent increasing pressure curve of 0.25” for balance systems. The fill pipe opening on older non-ORVR equipped cars is the suspected cause. ARB is planning public workshop for late summer or fall of 2016 to discuss solutions.

Mobile Fueling Platforms – Also known as “Fuel on Demand Systems”. There are three different business models: five gallon “spot delivery”, fueling truck that delivers a full tank, and vehicle fleet fueling. ARB has made a formal request of known service providers to describe equipment and process used. Also requested information to forecast business growth. Vapor recovery equipment installed? Existing regulations adequate / applicable?

Dispenser Replacement: Recently, there has been an increase in the number of units being replaced. A “major modification” triggers immediate compliance with current executive order. Group commented that a need for addition training on ISD exists.

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E. Managers commented that ARB has approved new emission factors for vapor recovery systems – they are posted on the web. A request was made to expedite their approval by CAPCOA so that they may be used before the next AB2588 quadrennial update. Concern expressed that e-factors may not reflect recent changes in benzene content nor properly account for ethanol utilization. In addition, their accuracy may be in question given the observed pressurization phenomenon.

TARMAC Report / OEHHA Update – Mohan Balagopalan explained that the group is working on the following projects: toxics release inventory, risk assessment overview, GDF emission factors, Heavy Metals from glass manufacturers, and testing at crematories.

Leland requested that District provide info/comments on the proposed EMFAC 2017 update.

GHG Protocols – Group: Chair to follow-up with Alan Abbs to determine if E. Managers' protocol recommendations were approved by the Board. Group was previously asked to take a second look at the weatherization protocol and did so. Consensus remains unchanged – the protocol is incompatible with AB32 goals because the emission reductions are from energy savings as a result of a reduction in the amount of fossil fuel combusted.

GHG Oil & Gas Workgroup/Fracking – Kerby led the discussion. Regulation going before ARB Board in the near term. Details to be provided at Symposium.

Part 3 – ARB Updates

Chris G. to give a presentation on the Clean Power Plan at the Symposium.

Evan Powers described the reboot of ARB-CalRecycle-CAPCOA Waste Workgroup. Part of short-lived climate protection strategy under SB605. Looking for consistency throughout the state. Biogas standards possible. 90% organic waste diversion required by 2025 plus 75% solid waste diversion under AB341. To process the 10 million tons of compostable organic material, it is estimated that 30 to 100 new facilities are needed statewide. The Waste Workgroup will consist of the following sub-groups: permitting, CEQA, economic incentives, and facility information. Alan Abbs to work with Districts to populate subgroups and to identify appropriate deliverables. Website is under development. Milestone – regulation to be adopted by end of 2018.

Group discussion on availability of e-factors. Barry Young to give presentation at Symposium.
<http://www.calrecycle.ca.gov/Laws/Rulemaking/Compost/default.htm>

Part 4 – EPA Updates, Laura Yannayon

Federal Permitting Regulatory Updates – Electronic reporting and e-notice presentations to be provided at the Symposium.

Federal GHG Activities – Information to be provided at the Symposium

Update on Title V Program Evaluations – The South Coast AQMD evaluation has been completed and EPA expects to finish the draft report in July 2016 and finalize the report by September 2016. Next evaluation has not been determined.

NSPS and NESHAP Updates – to be provided by Lisa at the Symposium

Status of SIP and PSD Rule Approvals - EPA expects to soon finalize a rule that will revise its Regional Consistency regulations to ensure the EPA has the flexibility necessary to implement Clean Air Act programs on a national scale while addressing court rulings that concern certain agency actions under the Act. There are currently four SIPs where EPA has made findings of the failure to submit revisions to fully and properly address PM2.5.

Oil and Gas Stationary Source Determination Rule - EPA finalized revisions to NSPS OOOO on June 3, 2016. The purpose is to reduce methane emissions from the oil and natural gas industry. The revision includes the new stationary source definition a CTG model rule for SIPs, and an information request.

Part 5—Districts Updates / Issues

Portable Diesel Engine ATCM amendment project – Data indicates that only a fraction of the portable equipment fleets will be in compliance with the 2017 regulatory milestone. Tier 4 engine cost and late arrival to market place were cited as reasons. Two options were initially identified: “tier drop” method and a modified fleet-wide average approach. Current proposal is to combine both where tier 1 engines would be prohibited (tier drop) by 2020 for fleets with less than 750 horsepower. Fleets with greater than 750 horsepower could still use a modified form of fleet-wide averaging with special consideration given to extreme non-attainment areas. With additional flexibility will come additional recordkeeping and reporting requirements. There are no plans to modify stationary source determinations.

Warm Mix Asphalt – Barbara M. led the discussion on this item asking if anyone had experience with this product. Manufacturer claims 50% reduction of VOC achieved during field application of product in part due to lower working temperature of the mix (260 °F). Group discussed ramifications to plant operation and necessary modifications to permit conditions. Barbara also described permitting challenges and the complex enforcement case involving a local asphalt mix facility.

Air Curtain Incinerators – David L. gave a brief overview of the issue. The discussion highlighted ARB’s ability to issue a general “statewide” Title V permit, Butte Co APCD intent to regulate under their open burning program and obtain approval from their Board to do so pursuant to H&SC 41812, and proper operation / best management practices for air curtain incinerator units. Permitting challenges identified included emission reduction credits, performance testing, and compliance with opacity limits.

New BACT Determinations & Unique Permitting Activities

As a result of the Aliso Canyon accident, the natural gas storage capacity for the greater LA area is no longer adequate. A shortage is predicted to result in 14 days this summer where rolling blackouts will occur. Utility companies are seeking variances from RECLAIM requirements in order to install modifications that would allow alternative firing on diesel fuel. 30 to 40 tons of additional NOx are predicted, however, this approach is preferred over the reliance on individual back-up emergency generators throughout the region to make up the difference.

The group noted an increase in the number of wood-fired commercial grilling operations (national restaurant chain). The group anticipates an increase in odor complaints and possible opacity violations.

Kerby informed the group about medical waste disposal units utilizing pyrolysis. He recommended a proactive approach making use of effective relationships local land use decision making entities. The best way to mitigate a nuisance is through proper land use planning.

Permitting challenges regarding nuisance odors from anaerobic food digester were discussed. The conditions of a recent variance granting a reduction in flare operating temperatures was highlighted. Source testing for dioxins and furans from the digester was a condition of the variance. H&SC does not grant authority to Districts to regulate odors from composting operations.

A case study was presented outlining how a S. Coast AQMD coffee roaster demonstrated compliance with the 60 ppm NOx limit while using natural gas burners located at two separate locations in the process line but which are vented with a common exhaust stack.

A discussion on the characterization of portable/temporary operations at Title V (Part 70) sources focused on whether the devices should be listed as authorized equipment. Many Districts simply describe the activity and then list the requirements rather than identifying the specific unit or device (model and serial number) which will be used. A section listing "Short Term Activities" is the approach preferred by some. Storage tank "degassing" operations was used as an example. SacMetro is seeking a written determination from EPA.

CAPCOA Training – Kerby announced the permitting basic training would be held at the Bay Area AQMD offices soon. The class would last 2 to 3 days and the dates would be finalized shortly.

Roundtable Discussion

David L. reported on the discovery of non-EPA certified engine installations in portable equipment. A specific example was cited where a portable stacking conveyor built in Georgia had an engine manufactured in Ireland as its power source. The engine was properly labeled "Engine is not authorized for use in the US". Presumably, the conveyor was made "for export only", however, it found its way into Butte Co.

ATTACHMENT:

1. Action Item Tracking Table
2. Minutes from the January 2016 Meeting